



Joseph E. Rothman  
Governor

Lori F. Kaplan  
Commissioner

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Mr. Brent Stiers  
Fleetwood Travel Trailers of Indiana, Inc.  
P.O. Box 665  
Crawfordsville, Indiana 47933

March 12, 2004

Re: 107-18274-00045  
First Minor Source Modification to  
Part 70 Permit No.: T107-7928-00045

Dear Mr. Stiers:

Fleetwood Travel Trailers of Indiana, Inc., was issued a Part 70 Operating Permit T107-7928-00045 on July 12, 1999 for a travel trailer manufacturing plant. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

- (a) One (1) paint booth, identified as EU-5, constructed in 2004, equipped with HVLP spray guns and applying coating to plastic substance, using dry filters for overspray control, and exhausting at stack S-5.
- (b) One (1) natural gas-fired drying booth, identified as EU-6, constructed in 2004, with a maximum heat input rate of 1.0 MMBtu/hr, and exhausting at stack S-6.

The following construction conditions are applicable to the proposed project:

## General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the minor permit modification has been issued.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Yu-Lien Chu, ERG, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

ERG/YC

cc: File - Montgomery County  
U.S. EPA, Region V  
Montgomery County Health Department  
Air Compliance Section Inspector - Jim Thorpe  
Compliance Data Section  
Administrative and Development - Sara Cloe  
Technical Support and Modeling - Michele Boner  
Title V Renewal Reviewer - ERG/ST



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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Fleetwood Travel Trailers of Indiana, Inc.**  
**1635 Elmore Street**  
**Crawfordsville, Indiana 47933**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T107-7928-00045	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: July 12, 1999  Expiration Date: July 12, 2004

First Significant Permit Modification No.: 107-11448-00045, issued April 5, 2000  
First Administrative Amendment No.: 107-12907-00045, issued December 21, 2000  
Second Administrative Amendment No.: 107-13784-00045, issued January 26, 2001  
First Reopening No.: 107-13429-00045, issued December 7, 2001

First Minor Source Modification No.: 107-18274-00045	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: <b>March 12, 2004</b>

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary travel trailer manufacturing operation.

Responsible Official:	General Manager
Source Address:	1635 Elmore Street, Crawfordsville, Indiana 47933
Mailing Address:	P.O. Box 665, Crawfordsville, Indiana 47933
SIC Code:	3792
County Location:	Montgomery
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) adhesive spray booth, identified as spray booth EU-2, utilizing HVLP spray equipment, with a maximum capacity of 96 units per day with an average of 4 units per hour, using dry filters as control, equipped with a 100 cfm exhaust fan, and exhausting to stack S2.
- (b) Uncontrolled VOC emissions from hand application processes which use sealants, caulks, adhesives and cleaning solvents, with a maximum capacity of 96 units per day with an average of 4 units per hour, exhausted to source ventilation and identified as EU-3.
- (c) One (1), exterior wall assembly station, identified as EU-4, utilizing various woodworking equipment, using a baghouse for particulate control, and exhausting to stack S4.
- (d) One (1) paint booth, identified as EU-5, constructed in 2004, equipped with HVLP spray guns and applying coating to plastic substance, using dry filters for overspray control, and exhausting at stack S-5.

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. (Twenty-nine (29) natural gas-fired overhead space heaters rated at 175,000 Btu/hr each, four (4) natural gas-fired overhead space heaters rated at 100,000 Btu/hr each and twelve (12) natural gas-fired space heaters rated at 80,000 Btu/hr each.)

- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (c) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Paved and unpaved roads and parking lots with public access.
- (f) Filter or coalescer media changeout.
- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) it is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) it is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION D.5

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (d) One (1) paint booth, identified as EU-5, constructed in 2004, equipped with HVLP spray guns and applying coating to plastic substance, using dry filters for overspray control, and exhausting at stack S-5.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.5.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 2-7-10.5]

Pursuant to 326 IAC 2-7-10.5(d)(Part 70 Minor Source Modification), the total VOC usage in paint booth EU-5, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Combined with the combustion emissions from drying booth EU-6, the potential to emit VOC from this modification is limited to less than 25 tons/yr. Therefore, the requirements of 326 IAC 8-1-6 (BACT) and 326 IAC 2-7-10.5(f) (Part 70 Significant Source Modification) are not applicable.

#### D.5.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-7-10.5] [326 IAC 2-4.1]

Pursuant to 326 IAC 2-7-10.5(d)(Part 70 Minor Source Modification),

- (a) A single HAP usage in paint booth EU-5, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month; and
- (b) The total HAP usage in paint booth EU-5, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Therefore, the requirements of 326 IAC 2-7-10.5(f) (Part 70 Significant Source Modification) and 326 IAC 2-4.1 (MACT) are not applicable.

#### D.5.3 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the PM from paint booth EU-5 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.5.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from paint booth EU-5 shall be controlled by a dry filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**Compliance Determination Requirements**

**D.5.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]**

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Compliance with the VOC and HAP usage limitations contained in Conditions D.5.1 and D.5.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.5.7 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack S-5 while paint booth EU-5 is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops (when the rooftop condition is not hazardous) and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.5.8 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.5.1 and D.5.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.5.1. and D.5.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The VOC and HAP contents of each coating material and solvent used;
  - (2) The amount of coating material and solvent less water used on monthly basis;

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The cleanup solvent usage for each month;
- (4) The total VOC and HAP usage for each month; and
- (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.5.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.5.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.5.1 and D.5.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**Compliance Data Section**

**Part 70 Quarterly Report**

Source Name: Fleetwood Travel Trailers of Indiana, Inc.  
Source Address: 1635 Elmore Street, Crawfordsville, Indiana 47933  
Mailing Address: P.O. Box 665, Crawfordsville, Indiana 47933  
Part 70 Permit No.: T107-7928-00045  
Facility: Paint Booth EU-5  
Parameter: Total VOC input  
Limit: Less than 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**Compliance Data Section**

**Part 70 Quarterly Report**

Source Name: Fleetwood Travel Trailers of Indiana, Inc.  
Source Address: 1635 Elmore Street, Crawfordsville, Indiana 47933  
Mailing Address: P.O. Box 665, Crawfordsville, Indiana 47933  
Part 70 Permit No.: T107-7928-00045  
Facility: Paint Booth EU-5  
Parameter: A single HAP Input  
Limit: Less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**Compliance Data Section**

**Part 70 Quarterly Report**

Source Name: Fleetwood Travel Trailers of Indiana, Inc.  
Source Address: 1635 Elmore Street, Crawfordsville, Indiana 47933  
Mailing Address: P.O. Box 665, Crawfordsville, Indiana 47933  
Part 70 Permit No.: T107-7928-00045  
Facility: Paint Booth EU-5  
Parameter: Total HAP Input  
Limit: Less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**March 12, 2004**

**Indiana Department of Environmental Management  
Office of Air Quality**

**Technical Support Document (TSD) for a  
Part 70 Minor Source Modification and a  
Part 70 Minor Permit Modification**

**Source Background and Description**

Source Name:	Fleetwood Travel Trailers of Indiana, Inc.
Source Location:	1635 Elmore Street, Crawfordsville, Indiana 47933
County:	Montgomery
SIC Code:	3792
Operation Permit No.:	T107-7928-00045
Operation Permit Issuance Date:	July 12, 1999
Minor Source Modification No.:	107-18274-00045
Minor Permit Modification No.:	107-18348-00045
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed a modification application from Fleetwood Travel Trailers of Indiana, Inc. relating to the construction of the following emission units and pollution control devices:

- (a) One (1) paint booth, identified as EU-5, constructed in 2004, equipped with HVLP spray guns and applying coating to plastic substance, using dry filters for overspray control, and exhausting at stack S-5.
- (b) One (1) natural gas-fired drying booth, identified as EU-6, constructed in 2004, with a maximum heat input rate of 1.0 MMBtu/hr, and exhausting at stack S-6.

**History**

On December 8, 2003, Fleetwood Travel Trailers of Indiana, Inc. submitted an application to the OAQ requesting permission to construct and operate an additional paint booth (EU-5) and a natural gas-fired drying booth (EU-6) at their existing plant. The proposed paint booth will be used to paint fiberglass and plastic sidewalls for recreational vehicles. The proposed drying booth is considered an insignificant activity, pursuant to 326 IAC 2-7-1(21). Fleetwood Travel Trailers of Indiana, Inc. was issued a Part 70 permit (T107-7928-00045) on July 12, 1999.

**Enforcement Issue**

There are no enforcement actions pending.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S-5	Paint Booth EU5	25	3.0	30,000	70
S-6	Drying Booth EU6	25	3.0	10,000	95

## Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification and the Part 70 Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 8, 2003. Additional information was received on January 21, 2004.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 3). The source stated that the maximum coating usage information is not available and is greater than the estimated coating usage used in the emission calculations.

## Unrestricted Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	19.2
PM-10	19.2
SO <sub>2</sub>	Negligible
VOC	Greater than 100
CO	0.37
NO <sub>x</sub>	0.44

HAP's	Potential To Emit (tons/year)
MIBK	Greater than 10
Ethylbenzene	Less than 10
Xylene	Less than 10
MEK	Greater than 10
Toluene	Less than 10
TOTAL	Greater than 25

## Justification for Modification

This modification is being performed through a Part 70 Minor Source Modification because (1) the potential to emit VOC of this modification is limited to less than 25 tons/yr and the PTE of HAPs is limited to less than 10 tons/yr for single HAP and less than 25 tons/yr for any combination of HAPs by limiting the VOC and HAP usage, pursuant to 326 IAC 2-7-10.5(d)(5)(A); and (2) the potential to emit PM/PM10 of this modification is greater than 5 tons/yr and less than 25 tons/yr, pursuant to 326 IAC 2-7-10.5(d)(4)(A). The permit modification is being performed through a Part 70 Minor Permit Modification pursuant to 326 IAC 2-7-12(b) because this modification meets all the requirements in 326 IAC 2-7-12(b)(1).

### County Attainment Status

The source is located in Montgomery County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Montgomery County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Montgomery County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions  
Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	Less than 250
PM-10	Less than 250
SO <sub>2</sub>	Less than 100
VOC	Less than 100
CO	Less than 100
NO <sub>x</sub>	Less than 100

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the potential to emit of the entire source in the TSD for the source's Title V permit (T107-7928-00045, issued July 12, 1999).

### Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Paint Booth EU-5	Less than 3.84	Less than 3.84	-	Less than 24.5	-	-	see note a
Drying Oven	0.03	0.03	Negligible	0.02	0.37	0.44	Negligible
Total PTE of this Modification	Less than 3.87	Less than 3.87	Negligible	Less than 25.0	0.37	0.44	see note a
PSD Significant Thresholds	250	250	250	250	250	250	NA

<sup>a</sup> Less than 10 for a single HAP and less than 25 for total HAPs.

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) The proposed paint booth will apply coatings to the body of recreational vehicles, which are made of plastic substance. Therefore, the proposed paint booth is not subject to the requirements of the New Source Performance Standards for Automobile and Light Duty Truck Surface Coating Operations (40 CFR 60.390 - 60.398, Subpart MM).
- (c) This existing source is a HAP major source and the proposed paint booth (EU-5) is used to apply coatings to plastic surfaces. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Productions (40 CFR 63.4480 - 63.4581, Subpart PPPP) are applicable.

This modification is not a reconstruction as defined in 40 CFR 63.2. Therefore, this source is considered an existing HAP major source for 40 CFR 63, Subpart PPPP. Pursuant to 40 CFR 63.4483(b), an existing source shall comply with 40 CFR 63, Subpart PPPP by August 29, 2006. Since the source's current Title V permit expires on July 12, 2004 and the Title V renewal permit is currently being drafted, the requirements of 40 CFR 63, Subpart PPPP will not be addressed in this modification and will be included in the

source's Title V renewal permit.

- (d) This modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1:
- (1) With the potential to emit before controls equal to or greater than the major source threshold;
  - (2) That is subject to an emission limitation or standard; and
  - (3) Uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR 64 (Compliance Assurance Monitoring) are not applicable to this modification.

### **State Rule Applicability - Paint Booth EU-5**

#### **326 IAC 2-7-10.5 (Part 70 Source Modification)**

The proposed paint booth EU-5 has a potential to emit VOC greater than 25 tons/yr and has potential to emit HAPs greater than 10 tons/yr for a single HAP and greater than 25 tons/yr for total HAPs. In order to make this modification minor, the source has proposed the following limits:

- (a) The total VOC usage in paint booth EU-5, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) A single HAP usage in paint booth EU-5, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The total HAP usage in paint booth EU-5, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Combined with the combustion emissions from drying booth EU-6, the potential to emit VOC from this modification is limited to less than 25 tons/yr and the potential to emit HAPs from this modification is limited to less than 10 tons/yr for a single HAP and less than 25 tons/yr for any combination of HAPs. Therefore, the requirements of 326 IAC 2-7-10.5(f) (Part 70 Significant Source Modification) are not applicable.

#### **326 IAC 2-4.1 (New Source Toxic Control)**

The potential to emit HAP from the proposed paint booth EU-5 is limited to less than 10 tons per year for a single HAP and less than 25 tons per year for any combination of HAPs. In addition, paint booth EU-5 is subject to the requirements of 40 CFR 63, Subpart PPPP. Therefore, the requirements of 326 IAC 2-4.1 (MACT) are not applicable to this paint booth.

#### **326 IAC 5-1 (Visible Emissions Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)**

Paint booth EU-5 was constructed after 1980 and has potential VOC emissions greater than 25 tons/yr. In addition, there are no other applicable 326 IAC 8 rules that apply to this plastic coating operation. Therefore, this booth is subject to 326 IAC 8-1-6 (BACT).

However, the source proposed to limit the VOC usage, including coatings, dilution solvents, and cleaning solvents, to less than 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 (BACT) are not applicable.

**326 IAC 6-3-2 (Process Operations)**

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued, these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations), which has been approved into the SIP, remains an applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) from paint booth EU-5 shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Under the rule revision, particulate from this paint booth shall be controlled by dry filters, or equivalent control devices, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This source uses dry filters to control overspray. Therefore, paint booth EU-5 is in compliance with 326 IAC 6-3-2(d).

**State Rule Applicability - Drying Booth EU-6 (Insignificant)**

There are no specifically applicable requirements for this drying booth. Therefore this unit is only documented in this TSD and will not be added to the Source's Part 70 permit.

**Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are

found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

1. The proposed paint booth (EU-5) has applicable compliance monitoring conditions as specified below:
  - (b) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack S-5 while paint booth EU-5 is in operation.
  - (c) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground.
  - (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because this paint booth must operate properly to ensure compliance with 40 CFR 52, Subpart P.

## Proposed Changes

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary travel trailer manufacturing operation.

Responsible Official:	<del>Brian Shee</del> <b>General Manager</b>
Source Address:	1635 Elmore Street, Crawfordsville, Indiana 47933
Mailing Address:	P.O. Box 665, Crawfordsville, Indiana 47933
SIC Code:	3792
County Location:	Montgomery
<b>Source Location</b> County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Minor Source, under PSD
	Major Source, Section 112 of the Clean Air Act
	<b>Not 1 of 28 Source Categories</b>

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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- (d) **One (1) paint booth, identified as EU-5, constructed in 2004, equipped with HVLP spray guns and applying coating to plastic substance, using dry filters for overspray control, and exhausting at stack S-5.**

## SECTION D.5

## FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]:**

- (d) One (1) paint booth, identified as EU-5, constructed in 2004, equipped with HVLP spray guns and applying coating to plastic substance, using dry filters for overspray control, and exhausting at stack S-5.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.5.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 2-7-10.5]**

Pursuant to 326 IAC 2-7-10.5(d)(Part 70 Minor Source Modification), the total VOC usage in paint booth EU-5, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Combined with the combustion emissions from drying booth EU-6, the potential to emit VOC from this modification is limited to less than 25 tons/yr. Therefore, the requirements of 326 IAC 8-1-6 (BACT) and 326 IAC 2-7-10.5(f) (Part 70 Significant Source Modification) are not applicable.

**D.5.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-7-10.5] [326 IAC 2-4.1]**

Pursuant to 326 IAC 2-7-10.5(d)(Part 70 Minor Source Modification),

- (a) A single HAP usage in paint booth EU-5, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month; and
- (b) The total HAP usage in paint booth EU-5, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Therefore, the requirements of 326 IAC 2-7-10.5(f) (Part 70 Significant Source Modification) and 326 IAC 2-4.1 (MACT) are not applicable.

**D.5.3 Particulate Matter (PM) [40 CFR 52, Subpart P]**

Pursuant to 40 CFR 52, Subpart P, the PM from paint booth EU-5 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad E = \text{rate of emission in pounds per hour; and} \quad P = \text{process weight rate in tons per hour}$$

**D.5.4 Particulate [326 IAC 6-3-2(d)]**

Pursuant to 326 IAC 6-3-2(d), particulate from paint booth EU-5 shall be controlled by a dry filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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**A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.**

#### **Compliance Determination Requirements**

##### **D.5.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]**

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Compliance with the VOC and HAP usage limitations contained in Conditions D.5.1 and D.5.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

##### **D.5.7 Monitoring**

- 
- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack S-5 while paint booth EU-5 is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops (when the rooftop condition is not hazardous) and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **D.5.8 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.5.1 and D.5.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.5.1. and D.5.2. Records necessary to demonstrate compliance shall be available within 30 days if the end of each compliance period.
    - (1) The VOC and HAP contents of each coating material and solvent used;
    - (2) The amount of coating material and solvent less water used on monthly basis;

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The cleanup solvent usage for each month;
- (4) The total VOC and HAP usage for each month; and
- (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.5.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.5.9 Reporting Requirements**

A quarterly summary of the information to document compliance with Conditions D.5.1 and D.5.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**Compliance Data Section**

**Part 70 Quarterly Report**

**Source Name:** Fleetwood Travel Trailers of Indiana, Inc.  
**Source Address:** 1635 Elmore Street, Crawfordsville, Indiana 47933  
**Mailing Address:** P.O. Box 665, Crawfordsville, Indiana 47933  
**Part 70 Permit No.:** T107-7928-00045  
**Facility:** Paint Booth EU-5  
**Parameter:** Total VOC input  
**Limit:** Less than 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month

**YEAR:** \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

**Submitted by:** \_\_\_\_\_  
**Title / Position:** \_\_\_\_\_  
**Signature:** \_\_\_\_\_  
**Date:** \_\_\_\_\_  
**Phone:** \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**Compliance Data Section**

**Part 70 Quarterly Report**

**Source Name:** Fleetwood Travel Trailers of Indiana, Inc.  
**Source Address:** 1635 Elmore Street, Crawfordsville, Indiana 47933  
**Mailing Address:** P.O. Box 665, Crawfordsville, Indiana 47933  
**Part 70 Permit No.:** T107-7928-00045  
**Facility:** Paint Booth EU-5  
**Parameter:** A single HAP Input  
**Limit:** Less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month

**YEAR:** \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

**Submitted by:** \_\_\_\_\_  
**Title / Position:** \_\_\_\_\_  
**Signature:** \_\_\_\_\_  
**Date:** \_\_\_\_\_  
**Phone:** \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**Compliance Data Section**

**Part 70 Quarterly Report**

**Source Name:** Fleetwood Travel Trailers of Indiana, Inc.  
**Source Address:** 1635 Elmore Street, Crawfordsville, Indiana 47933  
**Mailing Address:** P.O. Box 665, Crawfordsville, Indiana 47933  
**Part 70 Permit No.:** T107-7928-00045  
**Facility:** Paint Booth EU-5  
**Parameter:** Total HAP Input  
**Limit:** Less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month

**YEAR:** \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

**Submitted by:** \_\_\_\_\_  
**Title / Position:** \_\_\_\_\_  
**Signature:** \_\_\_\_\_  
**Date:** \_\_\_\_\_  
**Phone:** \_\_\_\_\_

Attach a signed certification to complete this report.

## **Conclusion**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 107-18274-00045. The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Permit Modification No. 107-18348-00045.

**Appendix A: Emission Calculations****VOC and PM/PM10 Emissions****From Spray Booth EU-5****Company Name: Fleetwood Travel Trailers of Indiana, Inc.****Address: 1635 Elmore St., Crawfordsville, IN 47933****MSM: 107-18274-00045****Reviewer: ERG/YC****Date: January 22, 2004**

Material	Density (lbs/gal)	Weight % Volatile (H <sub>2</sub> O & Organics)	Weight % Water	Weight % Organics	*Maximum Usage (gal/hr)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	**PTE of PM/PM10 before Control (lbs/hr)	**PTE of PM/PM10 before Control (ton/yr)	Transfer Efficiency	PM/PM10 Control Efficiency	PTE of PM/PM10 after Control (lbs/hr)	PTE of PM/PM10 after Control (tons/yr)
Mocha Frost Metallic	8.43	47.3%	0.0%	47.3%	0.76	3.99	3.03	72.8	13.3	1.18	5.17	65%	80%	0.24	1.03
Vomela Silver	8.42	47.3%	0.0%	47.3%	0.42	3.98	1.67	40.1	7.32	0.65	2.86	65%	80%	0.13	0.57
Lt. Cypress Green	7.95	70.9%	0.0%	70.9%	0.70	5.64	3.95	94.7	17.3	0.57	2.48	65%	80%	0.11	0.50
Hi-Ho Silver Metallic	8.42	47.6%	0.0%	47.6%	0.50	4.01	2.00	48.1	8.78	0.77	3.38	65%	80%	0.15	0.68
Polar White	10.47	35.4%	0.0%	35.4%	0.51	3.71	1.89	45.4	8.3	1.21	5.29	65%	80%	0.24	1.06
SSR-521 Reducer	6.86	89.4%	0.0%	89.4%	0.35	6.13	2.15	51.5	9.40	0.00	0.00	100%	80%	0.00	0.00
SSR-522 Reducer	6.90	99.7%	0.0%	99.7%	1.04	6.88	7.16	172	31.3	0.00	0.00	100%	80%	0.00	0.00
SSH-524 Hardener	9.02	89.0%	0.0%	89.0%	0.78	8.03	6.26	150	27.4	0.00	0.00	100%	80%	0.00	0.00
GA-1097 Accelerator	8.13	98.8%	0.0%	98.8%	0.04	8.03	0.32	7.71	1.41	0.00	0.00	100%	80%	0.00	0.00
V3K780 Fish Eye Reducer	11.01	96.7%	0.0%	96.7%	0.04	10.6	0.43	10.2	1.87	0.00	0.00	100%	80%	0.00	0.00
Empire LT Compliant Blend Gun Wash	6.72	51.0%	0.0%	51.0%	0.13	3.43	0.45	10.7	1.95	0.00	0.00	100%	80%	0.00	0.00
<b>Total</b>							<b>29.3</b>		<b>128</b>	<b>4.38</b>	<b>19.2</b>			<b>0.88</b>	<b>3.84</b>

\* This is estimated based on the proposed annual usage (gal/yr) / 4160 (hrs/yr) x 2 (safety factor). The source stated that the actual max. coating usage should be greater than this estimate.

\*\*Assume all the PM emissions are PM10 emissions.

**METHODOLOGY**

Pounds of VOC per Gallon Coating = (Density (lbs/gal) \* Weight % Organics)

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lbs/gal) \* Max. Usage (gal/hr)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lbs/gal) \* Max. Usage (gal/hr) \* (24 hr/day)

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lbs/gal) \* Max. Usage (gal/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

PTE of PM/PM10 before Control (lbs/hr) = Max. Usage (gal/hr) \* Density (lbs/gal) \* (1 - Weight % Volatile) \* (1-Transfer efficiency)

PTE of PM/PM10 before Control (tons/yr) = Max. Usage (gal/hr) \* Density (lbs/gal) \* (1 - Weight % Volatile) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

PTE of PM/PM10 after Control (lbs/hr) = PTE of PM/PM10 before Control (lbs/hr) \* (1 - PM/PM10 Control Efficiency)

PTE of PM/PM10 after Control (tons/yr) = PTE of PM/PM10 before Control (lbs/hr) \* (1 - PM/PM10 Control Efficiency) \* (8760 hr/yr) x (1 ton/2000 lbs)

**Appendix A: Emission Calculations  
HAP Emissions  
From Spray Booth EU-5**

**Company Name: Fleetwood Travel Trailers of Indiana, Inc.  
Address: 1635 Elmore St., Crawfordsville, IN 47933  
MSM: 107-18274-00045  
Reviewer: ERG/YC  
Date: January 22, 2004**

Material	Density (lbs/gal)	*Maximum Usage (gal/hr)	Weight % Methyl Isobutyl Ketone (MIBK)	PTE of MIBK (tons/yr)	Weight % Ethylbenzene	PTE of Ethylbenzene (tons/yr)	Weight % Xylene	PTE of Xylene (tons/yr)	Weight % MEK	PTE of MEK (tons/yr)	Weight % Toluene	PTE of Toluene (tons/yr)
Mocha Frost Metallic	8.43	0.76	7.00%	1.96								
Vomela Silver	8.42	0.42	8.00%	1.24								
Lt. Cypress Green	7.95	0.70			5.00%	1.22	30.0%	7.31				
Hi-Ho Silver Metallic	8.42	0.50	7.00%	1.29								
Polar White	10.47	0.51										
SSR-521 Reducer	6.86	0.35	17.0%	1.79					30.0%	3.15		
SSR-522 Reducer	6.90	1.04	17.0%	5.34					25.0%	7.86		
SSH-524 Hardener	9.02	0.78										
GA-1097 Accelerator	8.13	0.04										
V3K780 Fish Eye Reducer	11.01	0.04										
Empire LT Compliant Blend Gun Wash	6.72	0.13	5.00%	0.19							6.00%	0.23
<b>Total</b>				<b>11.8</b>		<b>1.22</b>		<b>7.31</b>		<b>11.0</b>		<b>0.23</b>

\* This is estimated based on the proposed annual usage (gal/yr) / 4160 (hrs/yr) x 2 (safety factor). The source stated that the actual max. coating usage should be greater than this estimate.

**Total HAPs = 31.6  
tons/yr**

**METHODOLOGY**

PTE of HAP (tons/yr) = Density (lbs/gal) x Max. Usage (gal/hr) x Weight % HAP x 8760 hr/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations  
Natural Gas Combustion  
(MMBtu/hr < 100)  
From the Drying Booth EU-6**

**Company Name: Fleetwood Travel Trailers of Indiana, Inc.  
Address: 1635 Elmore St., Crawfordsville, IN 47933  
MSM: 107-18274-00045  
Reviewer: ERG/YC  
Date: January 22, 2004**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

1.0

8.8

	Pollutant					
Emission Factor in lbs/MMCF	PM*	PM10*	SO <sub>2</sub>	**NO <sub>x</sub>	VOC	CO
	7.6	7.6	0.6	100	5.5	84.0
<b>Potential to Emit in tons/yr</b>	<b>0.03</b>	<b>0.03</b>	<b>2.6E-03</b>	<b>0.44</b>	<b>0.02</b>	<b>0.37</b>

\*PM and PM10 emission factors are condensable and filterable PM10 combined.

\*\*Emission factors for NO<sub>x</sub>: Uncontrolled = 100.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

### Methodology

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2000 lbs